

Civil
Right
cla

LezQuan Batts 4462
168 Frontage Rd.
Newark, N.J. 07114

United States District Court
District of New Jersey

LezQuan Batts
Plaintiff,

Civil Action _____

v.

Civil Action

Prea Accomodation Committee (PAC)
Individually and Officially
Jane and John Doe (1-10)

Verified
Complaint

Just Demand

1. Plaintiff, LezQuan Batts, (hereinafter "Plaintiff")
is a prisoner confined at the Northern State
Prison 168 Frontage Rd. Newark, N.J. 07114 under
SBI# 446206H. She is currently serving a sentence
of 5 with 85% under the NERA act.

2. Defendant, Prea Accomodation Committee, Jane and
John Doe 1-10 (hereinafter "PAC") are individuals who
at all times relevant hereto was employed by
New Jersey Department of Corrections as Sub-
Committee of the Sexual Assault Advisory Council
responsible for making individualized determinations
about transgender, intersex, or non-binary incarcerated
persons privacy, housing, and program assignment, and
had an ethical and legal responsibility to pursue their
duties diligently with an even hand and to abstain from

The Purpose of their Policies

and conduct which constituted a Crime, Fraud, malice, abuse of Process, abuse of power, Physical abuse, Obstruction of Justice, and/or willful misconduct and ~~for~~ the cover-up of such conduct resulting in unauthorized practice, and had direct personal involvement and/or actual knowledge and acquiescence in the wrongs enumerated in this Complaint, They/he/she/are/is state actor(s) acting under color of State law.

Nature of Action

3. This is an action against the aforementioned Defendants for Unauthorized Practice, inadequate practice of law, deliberate indifference, negligence, Civil Rights Violation, Retaliation, State intentional infliction of emotional distress, State Constitutional Claims, eighth amendment violations, first amendment violations and New Jersey law against Discrimination.

Jurisdiction And Venue

4. Congress enacted the Civil Rights Act to redress the deprivation, under color of state law, of rights secured by the laws and Constitution of United States of America, 42 U.S.C Section 1983. The New Jersey legislature enacted the New Jersey Civil Rights Act to redress violations of rights secured by the laws and Constitution of the United States and the Constitution of the State of New Jersey.
N.J.S.A. 10:6-1 et seq.

Count One

First Amendment Violation
Retaliation for Engaging in a Constitutional
Protected Activity

5. In the month of May 2024, DeQuan Batts hereinafter referred to as "PLAINTIFF" had her full minimum status revoked, removed from the minimum camps and placed back in General Population Single Cell status being subject to isolation and discrimination
6. NJ DOC Internal management Procedure Pcs.601. TG1.01 ensures the rebuttable presumption to live in line with their gender identity
7. Upon information and belief NJ DOC was put on notice that I was transgender in February 2024. Within 3 business days of notification, the Facility IPCM shall confidentially meet with the incarcerated person.
8. There is no rules or rights under this policy promulgated in the inmate handbook or ~~have~~ opportunity to express their own views with respect to safety and housing
9. Plaintiff had a protected liberty interest to be free from retaliation for filing grievances
10. Plaintiff's state created liberty interest to be protected from retaliation is within NJAC: 10A:14.4(b)
11. On July 9th 2024 I was given a 72 hour notice of this hearing by a Sgt Jones not the IPCM which is the practice

12. The "PAC housing / Program review took form of a Civil Contempt proceeding participating in Unauthorized Practice

13. Plaintiff was not aware that she was entitled to but not required to have Counsel present at any Conference with law enforcement agency

14. Anti Competitive witch hunt led by Defendant was less fair as it directly involved the "PAC" in a Kangaroo Court style Justice

15. Defendants Criminal Unauthorized Practice of law made it clear that my right to ~~the~~ liberty as a Transgender woman is hopeless and the intention to suppress my liberty interest is clear

16. The "PAC" neither fairly put the "PLAINTIFF" on notice as to what conduct is prohibited nor protect the transgenders Public Interest.

17. Having a medical procedure for my chronic core diabetes immediately before this Kangaroo court, I informed the defendant "I couldn't see because the side effects of the medication was affecting me I was told "Close your eyes you can see right" causing me emotional distress

18. "PLAINTIFF" was asked privileged questions about Criminal proceedings, Charges I haven't been convicted of, Names, dates and other Intusive, abusive questions.

19. This "PAC hearing" suppose to address gender Identity
Its main focus was my past Criminal proceedings

20. This board made up of Cisgender males and females
No known transgender women as myself was sufficiently
impartial to ~~be~~ make decisions on transgender care,
N/Doc fails to access to adequate medical care for
transgender women in their care.

21. Such Rogue and unlawful Pattern Practice of
Misconduct of the "Pac" is flaunted with impunity
and immunity in not only unlawful, unethical, and said
actions are outside of the color of the law
and strikes directly at the core of the U.S. Constitution,
1st Amendment but it is also conduct that is Unbecoming
of government officials subjecting "PLAINTIFF" to discrimination
in programs or activities sponsored by a public entity.
and Egregious conduct that outright betrays public
trust as public servants and strains the integrity
and moral of the profession here at NSP and DOC
as a whole.

22. Plaintiff respectfully request the defendants to cease
and desist any further retaliation, arbitrary and capricious
Placement in Isolated Confinement single cell, arbitrary and
Capricious revocation of my institutional full minimum status

Arbitrary Capricious denied of any rights and or Privileges where legitimate Penological interest is lacking

23. These wrongful acts and omissions by the above defendants constitute violation of Plaintiff's rights under the New Jersey Constitution

24. Plaintiff has suffered injuries as a result of these acts and omissions for which the above named defendant are liable in their individual Capacities amount to be proved at trial

25. The injuries suffered by Plaintiff as a result of these acts and omissions are of a continuing nature, and for which there is no adequate remedy of law

26. The Plaintiff has had Family file grievance with the Ombudsman and has consistently filed grievances concerning the Wrongdoing described above and, as to each material allegation herein, the Plaintiff has exhausted all available administrative remedies. The grievances and appeals, however, have routinely been denied without reasonable consideration or investigation.

27. Failure to Follow Federal regulations and policies

28. Jane doe Failed to ~~not~~ comply with policy(s) that Comported with the PREA Standards

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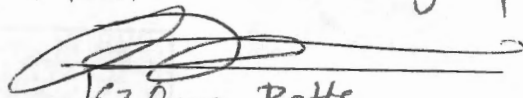
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29. While PREA does not grant inmates to have a private right to sue the violations that occurred with the "PAC" taken as a totality has violated the Plaintiff Eighth Amendment right to be free from cruel and unusual punishment

Prayer for Relief


1. Wherefore, Plaintiff demands judgement against each of the defendants, in their individual and official capacities as may be appropriate, jointly, severally and in the alternative, or such of them as may be determined to be liable under the premises, including, but not limited to, punitive damages
2. Plaintiff to recover from Defendants that cost of this action, including reasonable Counsel fees, if any and
3. Plaintiff to have such other relief and further relief as may be proper
4. Executed on this July, 2024


Lezquan Batts

Demand for Jury trial

Plaintiff hereby demands trial by jury on all issues triable herein.

Executed on this July day of 2024


Lezquan Batts



Explore

H&O Clinical PLLC
hoclinical@gmail.com

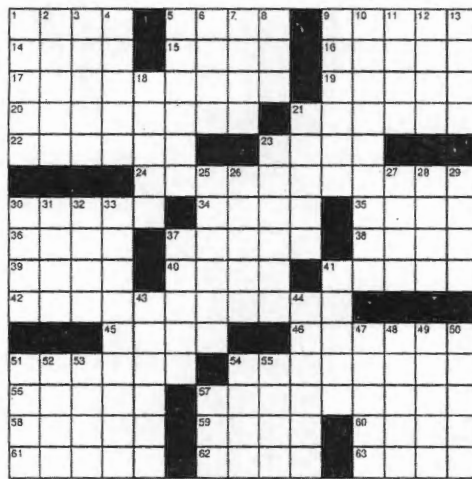
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Hot to Trot

Robert Stockton

ACROSS

1. "Oh, woe!"
5. The first to fall, after the fall
9. She had a cat named Dinah
14. The wise have it?
15. Subject of an apology from HAL-9000
16. What he says, goes
17. Stopped sleeping on the floor?
19. Catcher's position
20. Request to a barista
21. It might be Odd or happy
22. A hero might have it
23. Poi plant
24. Barber's instruction manual?
30. Album entry
34. The true face of Walter Mitty
35. Part of MIT
36. Neither all nor nothing
37. She and Nicole lived a Simple Life
38. Kind of values
39. Gets a bronze
40. Store sign
41. Evening news hr.
42. "Best of Intentions" or "Modern Day Bonnie and Clyde"?
45. Many unknown Johns and Janes
46. Surrounded by
51. Like a brand new trail
54. Prepare to end an engagement
56. Letter embellishment
57. Prestigious list of ground-breaking axioms?
58. Partner of Brahma and Vishnu
59. Stable parent
60. Are not casual?



61. Less green, perhaps
62. "The Heat"
63. It may require stitches
12. Part of a barbecue bed
13. German duck
18. Disney filler
21. Paris bistros
23. Fiddling (with)
25. Giraffes' kin
26. A singing Carpenter
27. Cognizant of
28. Automaker's amt.
29. Stern's opposite
30. "Yo, Bubi"
31. Word with zero or happy
32. Present opener?
33. Take a Porsche out without paying, perhaps
37. Prepared to be shot
41. Melodic subjects
43. Beyond bounds
44. Mediterranean sail
47. Neckwear for a dog or a dogface
48. "Beavis and Butt-head" spinoff
49. Gobsmacks
50. Part of a cog or a comb
51. "Back in the ____": Beatles
52. Soda available in grape, orange, and peach
53. Send sprawling
54. Spanish ladies: Abbr.
55. Drachma's replacemer
57. PA locator scare

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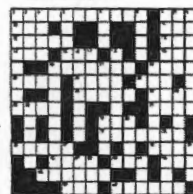
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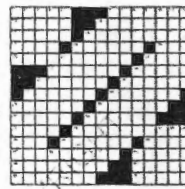
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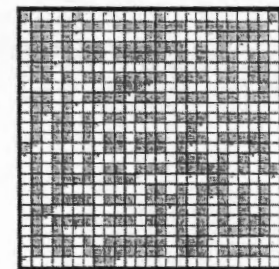
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CROSSWORD PUZZLE 1



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Certification

I hereby Certify that the matter in controversy is not the subject of any other action or arbitration Proceeding now or contemplated and that no other Party should be joined in this action except for additional defendants as may be discovered in the future

Executed on this July 1, 2024

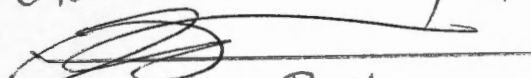

Lezquan Batts

Declaration

Plaintiff, Pursuant to Title 28 U.S.C Section 1746, declares under penalty of perjury that the following is true and correct

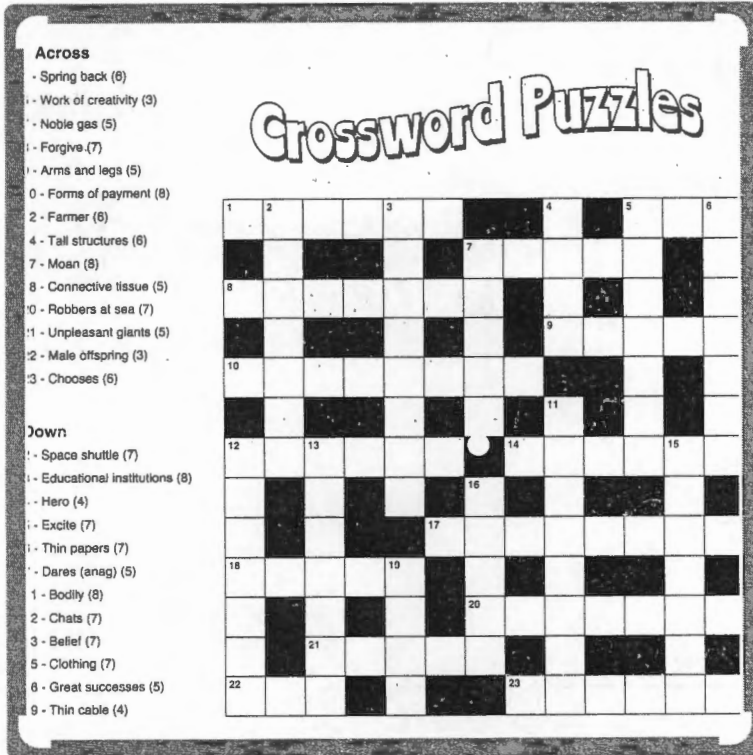
That she is the Plaintiff for this litigation; that she has read the above mentioned Complaint and knows the contents by official government documents, official Sources, first hand experiences and based upon information and belief. the allegations contained in this Complaint as they relate to these issues within her knowledge are true

Executed on this July 1, 2024


Lezquan Batts



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